

United States Government

Department of Energy

Bonneville Power Administration

# memorandum

DATE: December 14, 2001

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA-35)

TO: James Jellison - TFO/Olympia  
Natural Resource Specialist

**Proposed Action:** Vegetation Management along the Chehalis-Mayfield No. 1 230 kV Transmission Line ROW and the Mossy Rock–Chehalis Transmission Line ROW, between 7/1 to 27/10. The proposed work will be accomplished in the indicated sections of the transmission line corridor with an average corridor width of 162 feet.

**Location:** The ROW is located in Lewis County, WA, being in the Olympia Region.

**Proposed by:** Bonneville Power Administration (BPA).

**Description of the Proposed Action:** BPA proposes to clear unwanted vegetation in the rights-of-ways and around tower structures that may impede the operation and maintenance of the subject transmission lines and access roads, including Reclaim and Danger Trees. BPA plans to conduct vegetation control with the goal of removing tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation. All work will be executed in accordance with the National Electrical Safety Code and BPA standards. Danger and "C" trees contract work is scheduled to begin January 1, 2002. Follow-up chemical treatment is planned to begin in the late spring of 2002.

**Analysis:** This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) and Record of Decision (ROD). The Planning steps are described in the attached checklist. See checklist.

- Vegetation herbicide treatments on sprouting-types of species ensure that the roots are killed. Prevention of re-sprouts encourages low-growing plant communities to establish themselves and flourish on the right-of-way.
- According to Richard Bellon, Chehalis Tribal culture site specialist, there are known cultural sites in the vicinity of Chehalis-Mayfield transmission line. Richard is aware of BPA's brush cutting practices on the right-of-way. He is more concerned if BPA's brush cutting activities lead to soil disturbances off of the right-of-way roads from dozing and digging from heavy equipment like a crawler tractor. If cultural sites were identified, Richard requests that BPA contact him so a survey of the site can be performed and registered with the State of Washington.

- Water resources (streams, rivers, wetlands and well) will be protected with 100-foot buffers (165 foot buffer for the well) combined with the spot application of 50/50 Accord or Garlon 3A/Water for stump treatment in the riparian zones immediately outside the buffers.
- No 'in stream' work is to take place without prior consultation with the appropriate government agencies and permits are in place.
- Herbicides will be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions.
- Re-seeding /re-planting regimes have not been planned at this time. Low growing aggressive native vegetation within the right-of-way can naturally dominate with the elimination of tall growing vegetation.
- Beginning in the spring, 2002 the brush cutting and herbicide application program will be monitored for soil erosion and follow-up treatment, and if necessary native grass re-seeding program will be implemented.

This Supplement Analysis finds that 1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; 2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required, unless Potential Spotted Owl or Marbled Murrelet habitat is removed.

/s/John Howington

John Howington  
Physical Scientist – KEPR-4

CONCUR: Thomas C. McKinney  
Thomas C. McKinney  
NEPA Compliance Officer

DATE: 12/14/01

# Vegetation Management Checklist

## 1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

### 1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Mossy Rock-Chehahis/ Chehalis-Mayfield	7/1 to 27/10 & 1/1 to 22/4	225	22

See Handbook — [List of Right-of-way Components](#) for checkboxes and the requirements for the components [Rights-of-way](#), [Access Roads](#), [Switch Platforms](#), [Danger Trees](#), and [Microwave Beam paths](#).

Right Of Way:

Right-of-Way – clearing in right-of-way

Transmission Structures – clearing around

Access Road clearing - approximate miles – **Fill-in**

Reclaim (“C”) Trees

### 1.2 Describe the vegetation needing management.

See handbook — [List of Vegetation Types](#), [Density](#), [Noxious Weeds](#) for checkboxes and requirements.

Vegetation Types:

Douglas Fir

Alder

Wild Cherry

Noxious Weeds - Scotchbroom

Blackberries

Density:

Low (50 stems or less/ per acre)

**1.3 List measures you will take to help promote low-growing plant communities. If promoting low-growing plants is not appropriate for this project, explain why.** See Handbook — for requirements and checkboxes.

Cut stump or follow-up herbicide treatments on sprouting-types species will be carried out to ensure that the roots are killed. Vegetation that will grow tall will be selectively eliminated before it reaches a height or density to begin competing with low-growing species.

### 1.4 Describe overall management scheme/schedule.

See Handbook - [Overall Management Scheme/Schedule](#).

**Initial entry** – All tall growing trees and brush to be cut and chemically treated to prevent grow-into trees into the lines on the corridor. Access, right-of-way roads and structure sites are to be cut and treated. The danger trees will be cut that is adjacent to the Fairmount-Port Angeles No. 1 & 2 lines. Danger and “C” trees contract work is

to begin January 1, 2002 and the brush cutting will begin November. Follow-up chemical treatment to begin in the late spring of 2002.

**Subsequent entries** – Every 3-4 years, a maintenance contract will be necessary to treat sprouts. The use of herbicides on the initial and subsequent cycles should reduce the quantity and cost of work.

**Future cycles** – Same as above.

## 2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

### 2.1 List the types of landowners and land uses along your corridor.

See Handbook — [Landowners/Managers/Uses](#) for requirements, and [List of Landowners/Managers/Uses](#) for a checkbox list.

Landowners/Managers/Uses:

Residential

Rural

Grazing lands

Industrial Forest lands

**Describe method for notifying right-of-way landowners and requesting information (i.e., doorhanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate.**

See Handbook — [Methods for Notification and Requesting Information](#) for requirements.

Olympia will send letters to the property owners 2 weeks prior to cutting the brush. Door to door contact will be made where it is warranted.

### 2.3 List the specific land owner/landuse measures — determined from the handbook or through your consultations with the entities — that will be applied.

See handbook — [Requirements and Guidance for Various Landowners/Uses](#) for requirements and guidance, also [Residential/Commercial](#), [Agricultural](#), [Tribal Reservations](#), [FS-managed lands](#), [BLM –managed lands](#), [Other federal lands](#), [State/ Local Lands](#).

Span		Landowner/use	Specific measures to be applied
To	From		
3/5+525	¾	Edward Butler	Xmas Trees Agreement
5/7	5/4+475	George Brossard	Tree and Brush Agreement
6/5+150	6/3	Sam Baxter	Xmas Trees Agreement
10/6+450	10/6+100	Bert Holmes	Xmas Trees Agreement
10/7+150	10/6+600	Lance Thurston	Xmas Trees Agreement
11/4	11/1+100	Tree Man. Plus, Inc	Xmas Trees Agreement
14+300	14/2+75	Peter Murphy	Xmas Trees Agreement
8/5	7/4	Marshall Hunting	Xmas Trees Agreement-MR-Chehalis
11/8	11/7	Micheal Shish	Xmas Trees Agreement-MR-Chehalis

**2.4 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table above any provisions that need to be followed and where they are located.**

See handbook — [Landowner Agreements](#) for requirements.

Marshall Hunting has Xmas trees well beyond the agreement area 7/4 to 7/6+250 and some of the trees are out of compliance, greater than 15'hts.

**2.5 List any known casual informal use of the right-of-way by non-owner publics. List any constraints or measure's to take due to the informal use.**

See handbook — [Casual Informal Use of Right-of-way](#) for requirements.

Water sheds for water supply 7/9+300 to 8/1 and 16/4+150 to 16/4+1050.

**2.6 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with. Describe method of notification and coordination.**

See handbook — [Other Potentially Affected Publics](#) for requirements and suggestions.

Chehalis Tribe has known cultural sites in the vicinity of Chehalis-Mayfield transmission line according to Richard Bellon, Chehalis Tribal culture site specialist. Richard is aware of BPA's brush cutting practices on the right-of-way. He is more concerned if BPA's brush cutting activities leads to soil disturbances off of the right-of-way roads from dozing and digging from heavy equipment like a crawler tractor. If cultural sites were identified, Richard requests that BPA contact him so a survey of the site can be made and registered with the State of Washington.

**3. IDENTIFY NATURAL RESOURCES**

See Handbook — [Natural Resources](#)

**3.1 List any water resources (streams, rivers, lakes, wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.**

See Handbook — [Water Resources](#) for requirements for working near water resources including buffer zones.

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
2/3+ 552	2/3	Un-named CK./Wetlds	No	Hand/Sel	Garlon 3A/Accord	Spot appl.	100'	Trees fallen away from creek
2/4+ 400	2/4+200	Ripple Creek	No	Hand/Sel	Garlon 3A/Accord	Spot appl.	100'	Trees fallen away from creek.
4/5+625	4/5	Wetlands	No	Hand/Sel.	Garlon 3A/Accord	Spot appl.	100'	Trees fallen away from creek
7/8+ 615	7/8	Wetlands	No	Hand/Sel.	Garlon 3A/Accord	Spot appl.	100'	Trees fallen en away from creek
8/1	7/9	Water Shed	No	Hand/Sel.	Garlon 3A/Accord	Spot appl.	100'	Trees fallen away from creek.
8/9	8/8+700	Un-named Creek	No	Hand/Sel.	Garlon 3A/Accord	Spot Appl.	100'	Trees fallen away from creek.
9/6+ 750	9/6+300	Un-named Creek	No	Hand/Sel.	Garlon 3A/Accord	Spot Appl.	100'	Trees fallen away from creek.
18/4	18/3+300	Mill Creek	No	Hand/Sel.	Garlon 3A/Accord	Spot Appl.	100'	Trees fallen away from creek.
18/9+ 300	18/9	Un-named Creek	No	Hand/Sel.	Garlon 3A/Accord	Spot Appl.	100'	Trees fallen away from creek.
Tap+ 800	Tap+600	Un-named Creek	No	Hand/Sel.	Garlon 3A/Accord	Spot Appl.	100'	Trees fallen away from creek.
9/1	8/9+400	Wetlands	No	Hand/Sel.	Garlon 3A/Accord	Spot Appl	100'	Trees fallen away from creek.

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
9/6+200	9/6	Mill Creek	No	Hand/Sel.	Garlon 3A/Accord	Spot Appl	100'	Trees fallen away from creek.
10/3	10/2+350	Un-named Creek	No	Hand/Sel	G 3A/Acd	Spot Appl	100'	Trees fallen away from creek.
11/1	10/8+300	Wetlds.	No	Hand/Sel	G 3A/Acd	Spot Appl	100'	Trees fallen away from creek.
11/4+ 200	11/3+100	Unamed Creek	No	Hand/Sel	G 3A/Acd	Spot Appl	100'	Trees fallen away from creek.

**3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners maybe able to provide this info if requested).**

See Handbook — [Herbicide Use Near Irrigation, Wells or Springs](#) for buffers and herbicide restrictions.

Span		Well/irrigation/or spring	Herbicide	Buffer	Other notes/measures
To	From				
4/10+500	4/10+500	Well	No herbicide	165	Skip-Area

**3.3 List below the areas that have Threatened or Endangered Plant or Animal Species and the name of the species, and any special measures that need to be taken due to their presence. Attach any BAs, T&E maps, or letters from US Fish and Wildlife.**

See Handbook — [T&E Plant or Animal Species](#) for requirements and determining presence.

Span		T&E Species	Method/mitigation or avoidance measures
To	From		
		No listed T&E Species on the 2TView	

**3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.**

See Handbook — [Protecting Other Species](#) for requirements.

Span		Species	Measures
To	From		
		N/A	

**3.5 List any visually sensitive areas and the measures to be taken at these areas.**

See Handbook — [Visual Sensitive Areas](#) for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
		N/A	

**3.6 List areas with cultural resources and the measures to be taken in those areas.**

See Handbook – [Cultural Resources](#) for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
		N/A	

**3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.**

See Handbook – [Steep/Unstable Slopes](#) for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
		N/A	

**3.8 List areas of spanned canyons and the type of cutting needed.**

See Handbook – [Spanned Canyons](#) for requirements.

Span		Methods, cutting
To	From	
		N/A

**4. DETERMINE VEGETATION CONTROL METHODS**

See Handbook — [Methods](#)

**4.1 List Methods that will be used in areas not previously addressed in steps above.**

See Handbook — [Manual](#), [Mechanical](#), [Biological](#), [Herbicides](#) for requirements for each of the methods.

Span		Methods, including herbicide active ingredient, trade name, application technique
To	From	
22/4+303	1/9+300	For non-sensitive areas (spans) cut stump/basal treatment with 25% Garlon 4 and 75% Forest Crop Oil (FCO). 50/50 Accord or Garlon 3A/Water for stump treatment in the riparian zones; Stubble treat structure sites and the right-of-way roads with 90% Water, 6% Forrest Crop Oil (FCO), 3% Garlon 4 and 1% Tordon 22 K. Follow-up chemical treatment, foliar application of the above chemicals as noted under stubble treatment, except for FCO.

**5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION**

**5.1 Describe the debris disposal methods to be used and any special considerations.**

See Handbook — [Debris disposal](#) for a checkbox list and requirements.

Debris Disposal:

Chip (Mechanical brush disposal unit cuts brush into chips 4 in. or less in diameter, and spread over ROW, piled on ROW, or trucked off site. Trunks too large for the chipper are limbed and the limbs chipped. Trunks are placed in rows along the edge of the right-of-way or scattered, as the situation requires.)

Lop and Scatter (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)

Mulch (Mulching is a debris treatment that falls between chipping and lop-and-scatter. The debris is cut into 1-to-2-ft. lengths, scattered on the right-of-way and left to decompose. This method is used when terrain and conditions do not allow the use of mechanical chipping equipment.)

**5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).**

See Handbook — [Reseeding/replanting](#) for requirements.

Span		Reason for Reseed/plant	Type of Seed or Plants	Native?
To	From			
		N/A		

Native grasses are present on the entire right-of-way that will seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads. BPA expects 2-3 vehicles of the brush contractor and 1 contract inspector vehicle will be present on the site. A brush machine will mulch the structure sites and right-of-way roads where Scotch Broom and Black Berries are present.

**5.3 If not using native seed/plants, describe why.**

N/A

**5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.**

Monitoring of the success of the brush cutting program will begin the spring in which evaluation of soil erosion as a result of the brush cutting program will be made. If grass seeding is necessary, native grass seed will be applied.

**6. DETERMINE MONITORING NEEDS**

See handbook — [Monitoring](#) for requirements.

**6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.**

Monitoring of the effectiveness of the herbicide treatment will begin in the spring and follow up treatment of cut stump/basal or foliar treatment of target vegetation. The cut stump mixture of the product is 25% Garlon 4 and 75% Forest Crop Oil (FCO), the foliar mixture is 90% water, 3% Garlon 4 with Depo-RTU drift retardant. There is virtually no drift that occurs with this mixture.

**6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.**

Annually patrol the transmission line by the line crew and the Natural Resource Specialist will periodically monitor the right-of-way for effective mitigation measures.

**7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION**

See handbook — [Prepare Appropriate Environmental Documentation](#) for requirements. . Also prepare Supplement Analysis — [Supplement Analysis](#) — for signature.

**Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are “substantial”.**

Known potential impacts and/or project work are in compliance and encompassed within the Transmission System Vegetation Management Program EIS.

**7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.**

No additional NEPA documentation Required.